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6 Attorneys for Secured Creditor
ARCHWAY BROADWAY LOAN SPE, LLC
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8 **UNITED STATES BANKRUPTCY COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**
10 **LOS ANGELES DIVISION**
11

12 In re
13 SEATON INVESTMENTS, LLC, *et al.*,
14 Debtors and Debtors-in-
Possession.
15

16 Affects:
17

- 18 ☐ All Debtors
19 ☐ Seaton Investments, LLC
20 ☐ Colyton Investments, LLC
21 ☒ Broadway Avenue Investments, LLC
22 ☐ SLA Investments, LLC
23 ☐ Negev Investments, LLC
24 ☐ Alan Gomperts
25 ☐ Daniel Halevy
26 ☐ Susan Halevy
27

Lead Case No. 2:24-bk-12079-VZ

Jointly Administered with Case Nos.:

2:24-bk-12080-VZ; 2:24-bk-12081-VZ;
2:24-bk-12082-VZ; 2:24-bk-12091-VZ;
2:24-bk-12074-VZ; 2:24-bk-12075-VZ; and
2:24-bk-12076-VZ

Chapter 11

**REQUEST FOR JUDICIAL NOTICE IN
SUPPORT OF ARCHWAY BROADWAY
LOAN SPE, LLC'S OPPOSITIONS TO:**

**RENEWED MOTIONS OF DEBTOR AND
DEBTOR IN POSSESSION BROADWAY
AVENUE INVESTMENTS, LLC FOR
ORDERS AUTHORIZING DEBTOR TO
ENTER INTO POST-PETITION LEASE
AND AUTHORIZING DEBTOR TO
OBTAIN POST-PETITION FINANCING
PURSUANT TO 11 U.S.C. § 364**

Date: December 12, 2024
Time: 11:00 a.m.
Crtrm.: 1368
255 E. Temple Street
Los Angeles, CA 90012

Hon. Vincent P. Zurzolo

**TO THE HONORABLE VINCENT P. ZURZOLO, UNITES STATES
BANKRUPTCY JUDGE, PARTIES IN INTEREST, AND THEIR COUNSEL:**

Secured creditor, Archway Broadway Loan SPE, LLC, a Delaware limited liability company, successor in interest to Archway Real Estate Income Fund I REIT, LLC (“Archway”), requests that the Court take judicial notice of the following adjudicative facts pursuant to Rule 201 of the Federal Rules of Evidence:

1. The records of the United States Bankruptcy Court for the Eastern District of Oklahoma, in bankruptcy case numbers 23-80391 and 23-80390, attached to the Declaration of Gerrick M. Warrington as Exhibit 8.

2. The records of the United States District Court for the Eastern District of Oklahoma, in case number 6:23-cv-00196-DES, attached to the Warrington Declaration as Exhibits 9–11.

3. The records of the California Secretary of State attached to the Warrington Declaration as Exhibits 12, 13, 18, 21, 22, 23, 24.

4. The November 6, 2020, Opinion and Order entered by the Review Department of the State Bar Court of California, attached to the Warrington as Exhibit 14.

5. The Order of Disbarment entered on February 2, 2022, in the Disciplinary Matter of David R. Schwarcz, (C.D. Cal. Case No: 2:21-ad-00461-PSG), attached to the Warrington Declaration as Exhibit 15.

6. The printout from the California State Bar for Attorney George Aaron Shohet, attached to the Warrington Declaration as Exhibit 17.

7. The Judgment entered against Ahron Stock in the Los Angeles County Superior Court in case Number 21CHLC34951, attached to the Warrington Declaration as Exhibit 19.

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1 8. The records of the United States District Court for the Southern District of New
2 York, in case number 1:22-cv-09997-JLR, attached to the Declaration of Gerrick M. Warrington
3 as Exhibit 20.

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5 DATED: November 27, 2024

FRANDZEL ROBINS BLOOM & CSATO, L.C.
MICHAEL GERARD FLETCHER
GERRICK M. WARRINGTON

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8 By: /s/ Gerrick M. Warrington
9 GERRICK M. WARRINGTON
10 Attorneys for Secured Creditor
11 ARCHWAY BROADWAY LOAN SPE, LLC
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